REMARKS

Applicant appreciates the thorough examination of the present application as evidenced by the final Office Action of March 31, 2008 (hereinafter "Final Action"). In particular, Applicant appreciates the Examiner's withdrawal of the section 112 rejections. Applicant respectfully submits that the pending claims are patentable over the cited combination for at least the reasons discussed above.

The Section 103 Rejections

A. Claims 47-86 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over United States Patent Application Publication No. 2003/0032460 A1 to Cannon *et. al.* (hereinafter "Cannon") in view of United States Patent No. 6,675,006 B1 to Diaz *et al.* (hereinafter "Diaz") in further view of United States Patent No. 7,269,444 to Mori (hereinafter "Mori"). *See* Final Action, page 2. The rejections of Claims 47-86 appear to substantially correspond to the rejections set out in the Final Action of October 18, 2007, except for the addition of the Mori reference. Accordingly, the comments below will be directed to the newly raised issues in the rejections. However, to assure that this submission is considered fully responsive, Applicant incorporates herein by reference Applicant's relevant previously submitted responses as if set forth in their entirety.

Applicant respectfully submits that many of the recitations of Claims 47-86 are neither disclosed nor suggested by the cited combination of Cannon, Diaz and Mori. For example, Claim 47 recites:

> A method of connecting a plurality of devices to a common accessory, comprising:
>
> receiving a first selection signal, at the common accessory from a selection device remote from the common accessory, configured to highlight a first output indicia that is specifically associated with one of the plurality of devices on the common accessory such that the highlighted first output indicia is observable by a user of the common accessory and the one of the plurality of devices; and
>
> establishing a connection between the one of the plurality of devices and the common accessory responsive to the first selection signal based on the highlighted first output indicia,
>
> **wherein ones of the plurality of devices are associated with a predetermined order of priority; and**
>
> **wherein establishing a connection comprises establishing a connection between the one of the plurality of devices and the common accessory based on**

the predetermined order of priority such that a connection between a device having a highest predetermined priority and the common accessory is established first if the device having the highest predetermined priority is present and a connection between a device having a next highest predetermined priority and the common accessory is established if the device having the highest predetermined priority is not present.

Independent Claims 66, 67 and 86 include similar recitations to the highlighted recitations of Claim 47. Applicant respectfully submits that independent Claims 47, 66, 67 and 86 and the claims that depend therefrom are patentable over the cited combination for at least the additional reasons discussed herein.

The Final Action admits that Cannon and Diaz fail to teach the highlighted recitations of Claim 47. *See* Final Action, page 4. However, the Final Action points to Mori as providing the missing teachings. *See* Final Action, page 4. Applicant respectfully disagrees. In particular, the Final Action points to the indication of priority by the digits 1 thorough 9 as discussed at column 4, lines 17-21 of Mori as providing the missing teachings. *See* Final Action, page 4. The Final Action also cites to Mori, column 6, lines 60-63 and column 7, lines 23-25. *See* Final Action, page 4. Applicant admits that these sections of Mori discuss priority. Applicant does not claim to have invented the concept of priority. However, the sections of Mori discuss that in a particular situation, a single portable device establishes a connection with a second device (an accessory), for example, a car navigation system, based on the priority of the second device in a particular situation. *See e.g.,* Mori, column 4, lines 28-29. In other words, in each particular situation, a particular accessory is deemed to have the highest priority for that situation (...when the car-navigation system 13 is not detected on the wireless LAN, the handset 12 has a higher priority and the ringing sound is produced. When the user is in the car, the car-navigation system 13 is selected and the speech call is enabled by the hands-free unit 47 of the car-navigation system 13. (*See* Mori, column 7, lines 23-38)) Thus, Mori discusses multiple "accessories," for example, a car navigation system 13 or a handset 12, and the priority is associated with these accessories, not the portable device.

In stark contrast, Claim 47 recites a **common accessory** and multiple devices attaching to the common accessory "such that a connection between a device having a highest predetermined priority and the common accessory is established first if the device having the highest predetermined priority is present and a connection between a device having a next

highest predetermined priority and the common accessory is established if the device having the highest predetermined priority is not present." Nothing in Mori discloses or suggests that multiple devices having associated priorities and connecting these devices to the common accessory based on the associated priorities as recited in Claim 47. Accordingly, Applicant respectfully submits that independent Claims 47, 66, 67 and 86 are patentable over the cited combination for at least the additional reasons discussed herein.

Furthermore, even assuming *arguendo* that Mori discusses a common accessory, nothing in Mori discusses multiple devices capable of connecting to the common accessory each having an associated priority, and connecting the device having the highest priority of the devices present, *i.e.* within range of the common accessory, as recited in Claim 47. Accordingly, Applicant respectfully submits that independent Claims 47, 66, 67 and 86 are patentable over the cited combination for at least the additional reasons discussed herein.

Applicant further submits that one of skill in the art would not be motivated to combine the cited references without using Applicant's disclosure as a road map. In particular, the Final Action states:

> ...it would have been obvious to one of ordinary skill in the art at the time the invention was made to have incorporated the teachings of Mori into the invention of Cannon and Diaz in order to allow the most suitable apparatus at relevant time and location to be automatically selected (citations omitted).

See Final Action, page 5. Applicant respectfully disagrees. As discussed above, Mori discusses multiple accessories having priorities and a single device attaching thereto based on the priority of the accessory. Cannon, on the other hand, discusses a single wireless hands free device and multiple connecting devices. The whole premise of Cannon is to give the driver's device priority. The passengers are given priority based on a first come first serve basis. *See* Cannon, Abstract. Thus, Applicant submits that one of skill in the art would not be motivated to combine the multiple accessory/single device teachings of Mori with the single accessory/multiple device teachings of Cannon without using Applicant's disclosure as a road map. Furthermore, Applicant respectfully submits that even if combined, the combination of Cannon, Diaz and Mori would not teach the recitations of the pending claims for at least the reasons discussed above. Accordingly, Applicant respectfully submits that

independent Claims 47, 66, 67 and 86 and the claims that depend therefrom are patentable over the cited combination for at least these additional reasons.

B. Claims 55-62 and 75-83 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Cannon, Diaz and Mori in further view of United States Patent Publication No. 2002/0173347 to Kinnunen. *See* Final Action, page 9. As discussed above, Applicant respectfully submits that the dependent claims are patentable at least per the patentability of the independent base claims from which they depend.

CONCLUSION

Applicant respectfully submits that the pending claims are in condition for allowance, which is respectfully requested in due course. Favorable reconsideration of this application is respectfully requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (919) 854-1400.

Respectfully submitted,

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CERTIFICATION OF TRANSMISSION

I hereby certify that this correspondence is being transmitted via the Office electronic filing system in accordance with § 1.6(a)(4) to the U.S. Patent and Trademark Office on June 30, 2008.

Candi L. Riggs